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Case||2:13-bk-29686-TD Doc 60 Filed 01/21/14 Entered 01/21/14 12:02:45 Desc
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  4
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    Attorneys for Debtor and Debtor-
     In-Possession
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  7
                       UNITED STATES BANKRUPTCY COURT
  8
                       CENTRAL DISTRICT OF CALIFORNIA
  9
                            LOS ANGELES DIVISION
 10
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    In re:
                                        Case No. 2:13-bk-29686-TD
 12
                                        Chapter 11
 13
                                        STIPULATION FOR ORDER CONTINUING
                                        HEARING ON DEBTOR'S DISCLOSURE
 14
    EFRAIN OLIVARES,
                                        STATEMENT
 15
 16
                                        Date: January 29, 2014
                                        Time: 10:00 a.m.
 17
               Debtor.
                                        Ctrm: 1345
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          TO THE HONORABLE THOMAS B. DONOVAN, UNITED STATES BANKRUPTCY
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    JUDGE, AND ALL OTHER INTERESTED PARTIES:
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         This Stipulation is made between Efrain Olivares ("Debtor")
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    and the Office of the United States Trustee ("OUST") by and
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    through their respective counsels of record, who hereby represent
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    and stipulate as follows:
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         1.
              A continued hearing on the adequacy of Debtor's
    Disclosure Statement is scheduled to be heard on January 29, 2014
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    at 10:00 a.m. (the "Hearing").
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- 2. The purpose of the continued Hearing is to provide additional time to the OUST to review Debtor's monthly operating reports ("MOR") and to provide evidence of the feasibility of Debtor's Plan.
- 3. Debtor believes that the Hearing should be continued to February 12, 2014 for the following two reasons:
 - Debtor submitted a complete loan modification on (A)January 11, 2014 and believes the bank must reply within 30 days and will be able to update the Court on that issue; and
 - Debtor will be able to submit his MOR for the month of (B) January which will provide OUST with better evidence as to the viability of Debtor's Plan.
- Debtor's Counsel further represents that he is 4. communicating with attorneys for the bank holding the first and only deed of trust against Debtor's primary residence.
- The bank has elected not to object to the Disclosure Statement.
- OUST is the only party in interest who has objected to the adequacy of the Disclosure Statement.
- 7. The OUST does not object to continuation of the Hearing.

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1	WHEREFORE Debtor and the OUST hereby stipulate and agree as		
2	follows:		
3	That the Hearing be continued for until February 12, 2014 or		
4	to a date convenient for the Court thereafter.		
5			
6	DATED: January 21, 2014 LAW OFFICES OF DAVID A. TILEM		
7			
8	By: Michael Aven		
9	Michael Avanesian, Attorney for Debtor		
10			
11			
12	DATED: January 21, 2014 PETER C. ANDERSON		
13	UNITED STATES TRUSTEE		
14	By: Queeni M		
15	Queenie K. Ng, Trial Attorney		
16	Tital Accorney		
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PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 206 North Jackson Street, Suite 201, Glendale, CA 91206

A true and correct copy of the foregoing document entitled (*specify*) **STIPULATION FOR ORDER CONTINUING HEARINGS ON DEBTOR'S DISCLOSURE STATEMENT** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

- 1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (date) 1/21/14, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:
 - Michael Avanesian michaelavanesian@tilemlaw.com, malissamurguia@tilemlaw.com;dianachau@tilemlaw.com;joanfidelson@tilemlaw.com
 - Sylvia Lew Sylvialew@tilemlaw.com, malissamurguia@tilemlaw.com;dianachau@tilemlaw.com;joanfidelson@tilemlaw.com
 - Queenie K Ng queenie.k.ng@usdoj.gov, melanie.green@usdoj.gov
 - United States Trustee (LA) ustpregion16.la.ecf@usdoj.gov

 Kristin A Zilberstein bknotice@mccarthyholthus.com, kz 	zilberstein@mccarthyholthus.com
	☐ Service information continued on attached page
2. <u>SERVED BY UNITED STATES MAIL</u> : On (date) <u>1/21/14</u> , I served the following persons and/or entities at adversary proceeding by placing a true and correct copy thereof in postage prepaid, and addressed as follows. Listing the judge here <u>be completed</u> no later than 24 hours after the document is filed.	n a sealed envelope in the United States mail, first class.
Honorable Thomas Donovan United States Bankruptcy Court 255 E. Temple Street, Suite 1352 Los Angeles, CA 90012	
	☐ Service information continued on attached page
3. <u>SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FA</u> for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or following persons and/or entities by personal delivery, overnight masuch service method), by facsimile transmission and/or email as fo that personal delivery on, or overnight mail to, the judge <u>will be confiled</u> .	controlling LBR, on (date), I served the ail service, or (for those who consented in writing to ollows. Listing the judge here constitutes a declaration
	☐ Service information continued on attached page
I declare under penalty of perjury under the laws of the United Stat	es that the foregoing is true and correct.
1/21/14 Malissa Murguia	malina munnin
Date Printed Name	Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.